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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 19-00046 BLF
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	SETTING HEARING DATE AND EXCLUDING
v.)	TIME FROM THE SPEEDY TRIAL ACT
)	CALCULATION
YVONNE LATTIMORE,)	
)	
Defendant.)	

The defendant, YVONNE LATTIMORE, represented by Bruce Funk, and the government, represented by Christopher Vieira, Special Assistant United States Attorney, appeared before the Court on October 20, 2020, for a status conference. Defense counsel represented that additional time was needed for attorney preparation.

The Court set a further status conference for January 5, 2021, at 9:00 a.m. Defendant requested that time be excluded under the Speedy Trial Act between October 20, 2020 and January 5, 2021 to conduct necessary investigation and continue to review discovery. The government did not object to the request to exclude time.

Therefore, the parties agree, and the Court finds and holds, as follows:

1. This matter is set before this Court for a status conference on January 5, 2021.

2. The time between October 20, 2020 and January 5, 2021 is excluded under the Speedy Trial Act. Failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial and in the prompt disposition of criminal cases. *See id.* § 3161(h)(7)(A).

Dated: 10/26/2020

/s/ Bruce Funk

BRUCE FUNK
Counsel for Defendant

Dated: 10/26/2020

/s/ Christopher Vieira

CHRISTOPHER VIEIRA
Special Assistant United States Attorney

IT IS SO ORDERED.

Dated: _____

BETH LABSON FREEMAN
United States District Judge